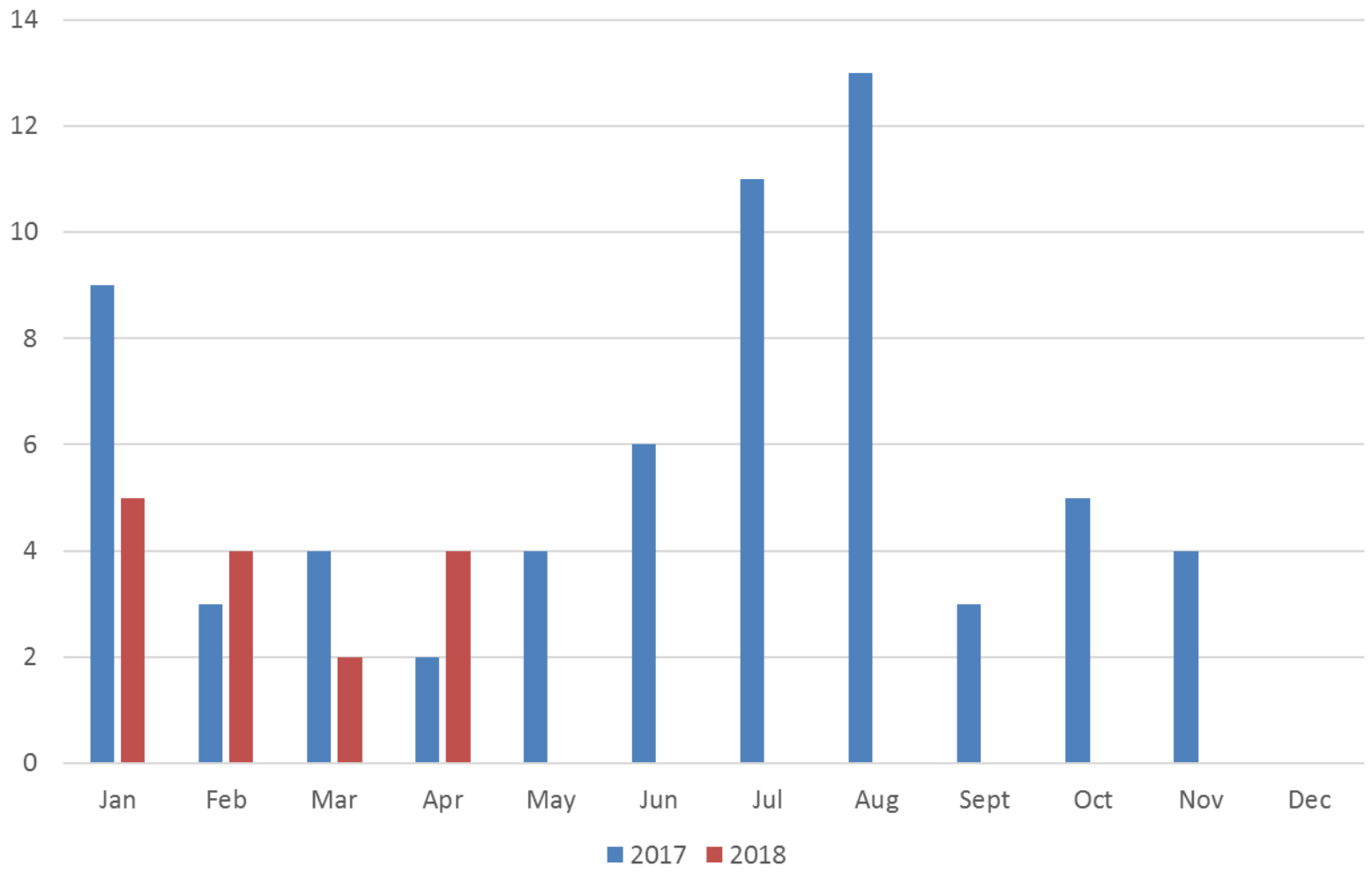
Vessel Pollution Compliance

Steps to Decrease Pollution

- Identify issue (increase reporting)
- Gather information (location/time/sample)
- Analyze data
- Determine foundational issue
- Correct issue (education/enforcement)

2017 vs 2018 NRC Reports



Oil Sample Analysis

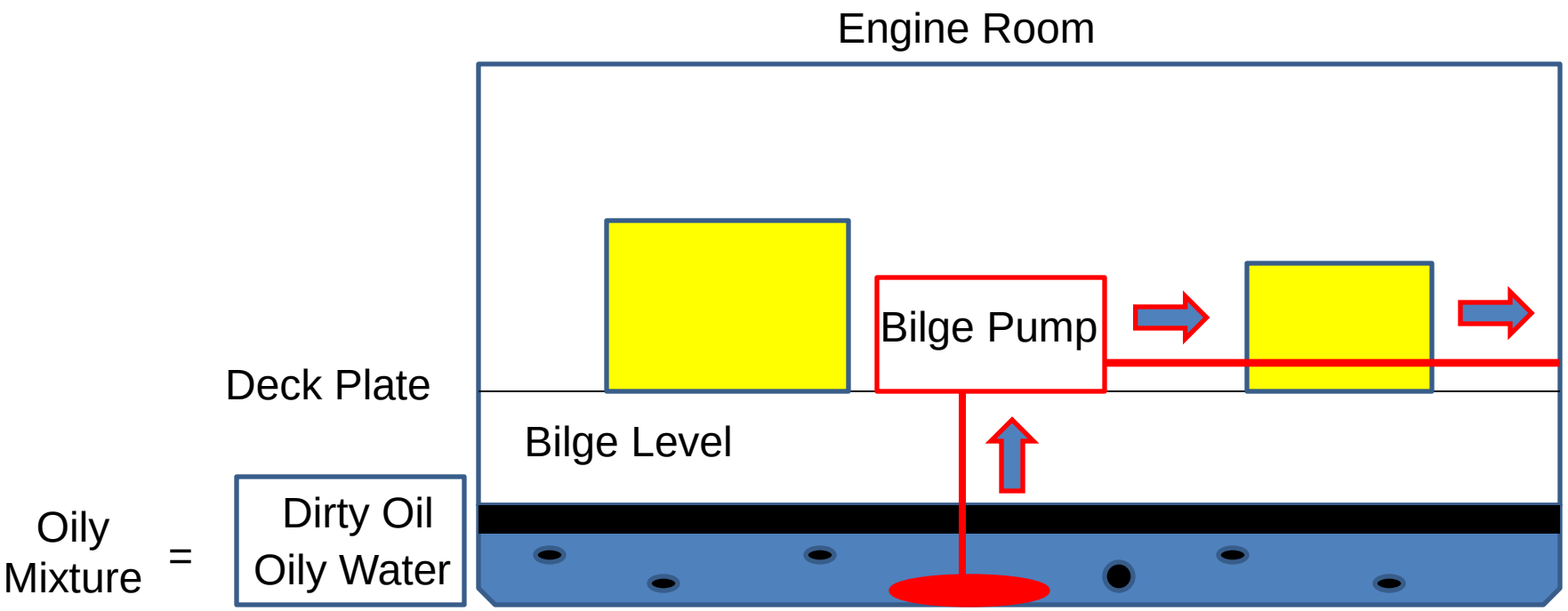
- Sample vessels in area of mystery sheen
- Mix of lube oil, fuel and hydraulic oil
- Representative of vessel bilge contents
- 4 matches for mystery sheen cases since 2015

Problem Statement

- Oily waste management practices and pollution prevention equipment are not consistent or compliant throughout commercial vessel fleet

- Goals:
  - Ensure industry knows requirements
  - Educate, promote and enforce waste management regulations and practices
  - Gain compliance

Improper Decanting Practice

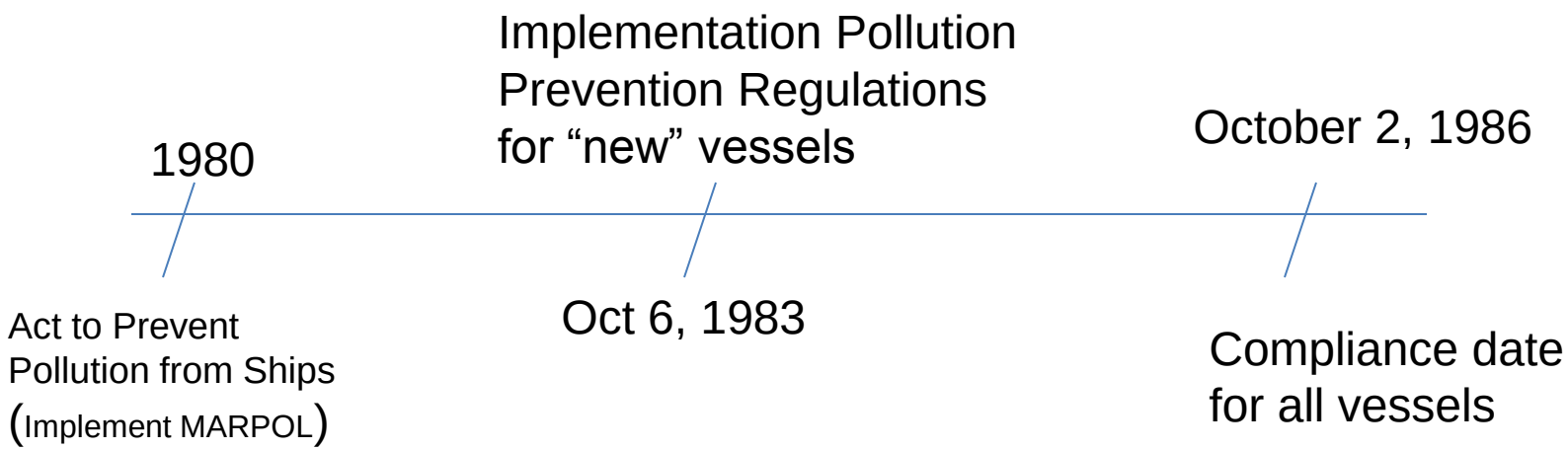


Decanting is illegal

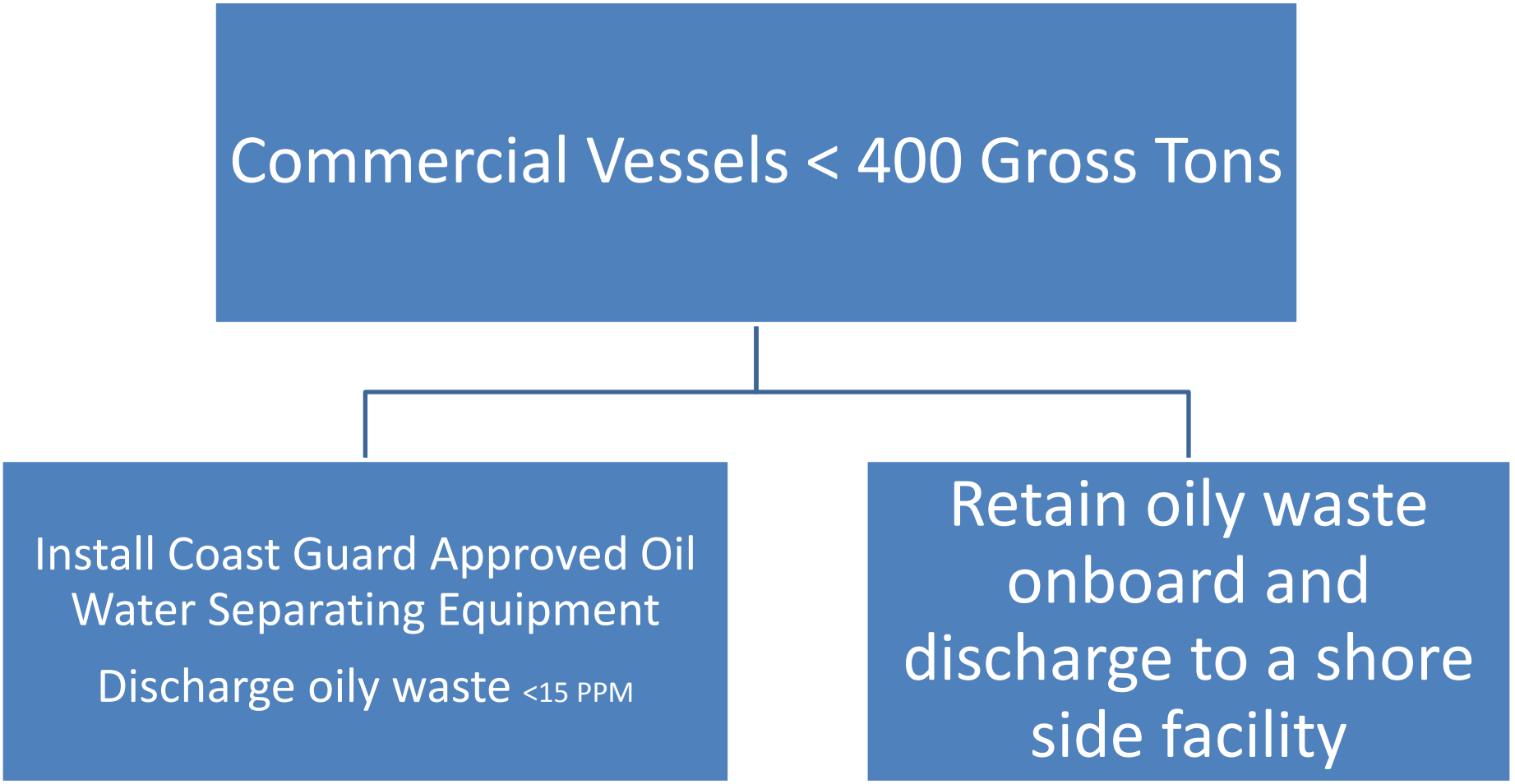
History of Regulations

- Originally all vessels > 100 gross tons would be required to install oily water filtration equipment

- Public comments led to retaining oily mixtures onboard option



33 CFR 155.350 Oceangoing (Operate > 3 NM from shore)
33 CFR 155.330 Non Oceangoing



Marine Safety Information Bulletin 03-18

Marine Safety Information Bulletin

Commandant
U.S. Coast Guard
Office of Commercial Vessel Compliance
2703 Martin Luther King Jr Ave SE, STOP 7501
Washington, DC 20593-7501
E-Mail: HQS-PF-FLDR-CG-CVC@USCG.MIL

MSIB Number: 03-18
Date: April 12, 2018

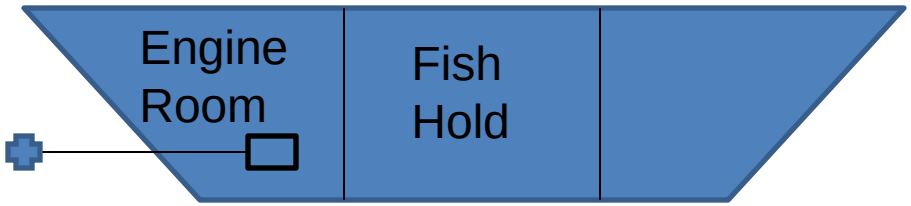
Oily Mixtures ("Oily Bilge Water") Management for Oceangoing Vessels of less than 400 Gross Tons[1]

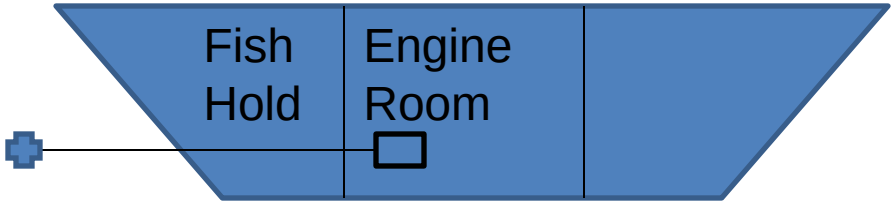
Compliance Options - Retain onboard or discharge through an oily-water separator (OWS)

Summary

This bulletin summarizes key legal requirements in 33 CFR Part 151, Subpart A and 33 CFR Part 155, Subparts A and B for the proper management and disposal of oily mixtures by oceangoing vessels under 400 gross tons.[2] An "oceangoing ship [or vessel]" – as defined in 33 CFR 151.05 – means any vessel that operates on international voyages, is certified for coastwise service beyond three miles, or operates beyond three nautical miles at any time. Oceangoing vessels falling into this category include – but are not limited to – tugs, ferries, shuttle vessels

Vessel Configurations





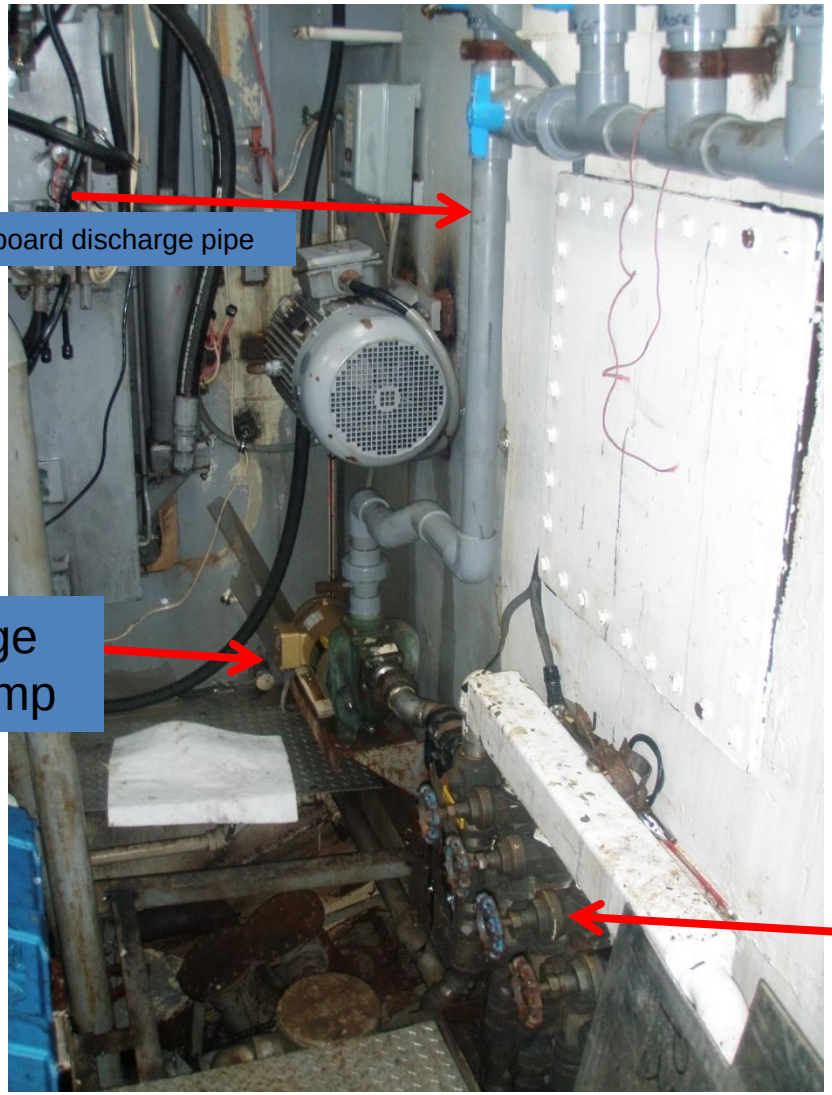
Minimize Waste Stream Generation

- Minimize leakage (repair holes, tighten seals, etc)
- Isolate compartments (without negatively impacting stability)
- May install OWS to extend voyage lengths
- Shorten voyage length if vessel cannot safely retain on board all oily mixtures
- Coast Guard not approving solutions

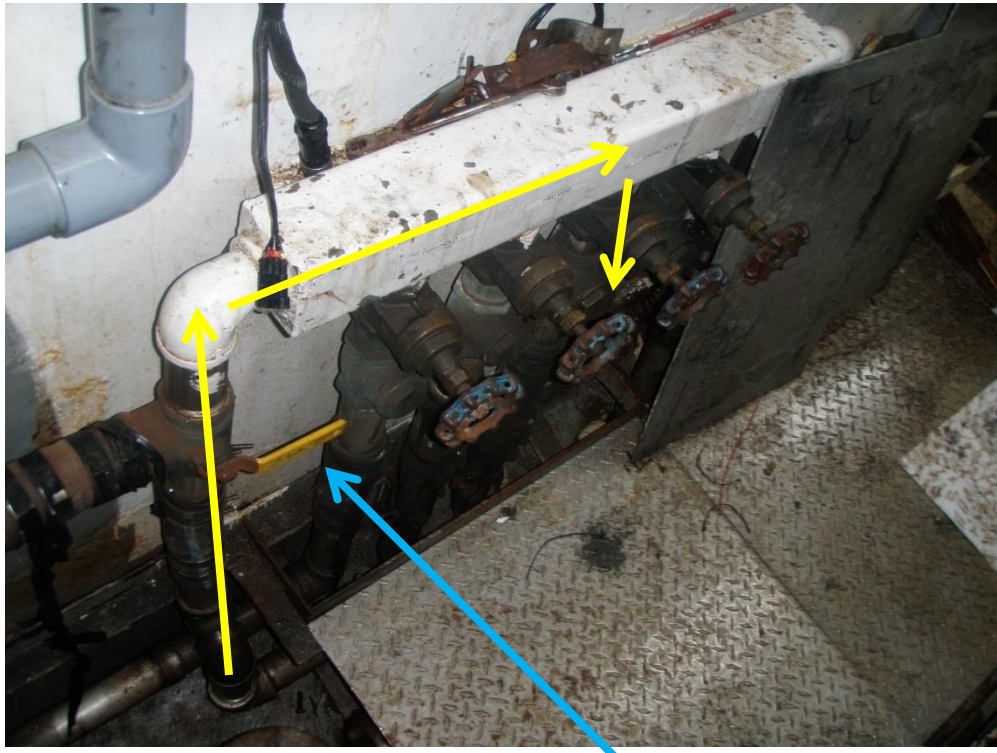
Increase Enforcement

- Letters of Warning
- Notice of Violation
- Class I Administrative Civil Penalty
- Judicial Civil Penalty
- Criminal

Bilge Manifold in Engine Room



Yellow arrows flow of water into engine room



Compliance Program

- Determine waste generation points
- Minimize waste streams
- Dispose of oily waste to shore side facility
- Maintain records of oil log book for three years

Ongoing Efforts

- Educational brochures to industry
- Pollution Prevention Marine Safety Bulletin
- Increase enforcement
- Held community outreach meeting w/ DOJ
- Station /cutter boarding team training
- Clean Bilge Program
- Local/state regulations

What is success?

- Decrease in oil spills ?
- Commercial vessel industry accounting for oil waste disposal as business expense
- Improved shore side waste disposal options
- Awareness of pollution prevention regulations
- 3rd Port of New Bedford oil spill work group is not needed